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Attorneys for the United States of America

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LARRY THOMAS,

Defendant.

Case No.: 12CR4832-JAH

JOINT MOTION TO CONTINUE
SENTENCING HEARING

The plaintiff, UNITED STATES OF AMERICA, by and through its counsel, LAURA E. DUFFY, United States Attorney, and Alessandra P. Serano, Assistant United States Attorney, and defendant, Larry Thomas, through his counsel, Victor Pippins, hereby jointly move this court to continue the sentencing hearing currently scheduled for Monday, December 9, 2013, at 8:30 a.m. to Monday, February 24, 2014 at 8:30 a.m.

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1 The parties agree that time should be excluded for purposes of the Speedy
2 Trial Act between December 9, 2013 and February 24, 2014 due to pending
3 motions on file. A continuance is needed as a denial of a request may affect
4 Defendant's sentence. Defendant is in custody.

5 Dated: December 3, 2013

Respectfully submitted,

6 LAURA E. DUFFY
7 United States Attorney

8 s/Alessandra P. Serano
9 ALESSANDRA P. SERANO
10 Assistant U.S. Attorney

11 Dated: December 3, 2013

12 s/ Victor Pippins
13 VICTOR PIPPINS
14 Counsel for Defendant
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1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF CALIFORNIA

3 UNITED STATES OF AMERICA,) Case No. 12CR4832-JAH
4)
5 Plaintiff,)
6)
7 v.) CERTIFICATE OF SERVICE
8 Larry Thomas,)
9 Defendant.)
10 _____)

11 IT IS HEREBY CERTIFIED THAT:

12 I, ALESSANDRA P. SERANO, am a citizen of the United States and am at
13 least eighteen years of age. My business address is 880 Front Street, Room 6293,
14 San Diego, California 92101-8893.

15 I am not a party to the above-entitled action. I have caused service of Joint
16 Motion to Continue on the following parties by electronically filing the foregoing
17 with the Clerk of the District Court using its ECF System, which electronically
18 notifies them.

19 Victor Pippins, Esq.

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21 I declare under penalty of perjury that the foregoing is true and correct.
22 Executed on December 3, 2013
23

24 s/Alessandra P. Serano
25 ALESSANDRA P. SERANO
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